

PHILLIP A. TALBERT  
Acting United States Attorney  
LAURA JEAN BERGER  
Assistant United States Attorney  
2500 Tulare Street, Suite 4401  
Fresno, CA 93721  
Telephone: (559) 497-4000  
Facsimile: (559) 497-4099

Attorneys for Plaintiff  
United States of America

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
BRENDA CARMONA-VENEGAS,  
  
Defendant.

CASE NO. 1:20-CR-00044-DAD  
  
STIPULATION TO CONTINUE SENTENCING  
DATE; ORDER  
  
DATE: December 6, 2021  
COURT: Hon. Dale A. Drozd

**STIPULATION**

Plaintiff United States of America, by and through its counsel of record, and defendant, by and through defendant's counsel of record, hereby stipulate as follows:

1. By previous order, this matter was set for sentencing on December 6, 2021.
2. By this stipulation, defendant now moves to continue the sentencing until February 28, 2022. As this is a sentencing and a change of plea has already been entered, no exclusion of time under the Speedy Trial Act is required.
3. The parties agree and stipulate, and request that the Court find the following:
  - a) Counsel for defendant desires additional time to work with defendant in obtaining records and other items in preparation for sentencing.
  - b) Counsel for defendant has also been diligently seeking this information, but defendant now works nights, and given the difficulty in scheduling meetings with defendant in

light of her schedule, obtaining information is taking longer than anticipated and is more challenging than anticipated.

c) Counsel for defendant believes that failure to grant the above-requested continuance would deny him the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.

d) The government does not object to the continuance.

IT IS SO STIPULATED.

Dated: November 10, 2021

PHILLIP A. TALBERT  
Acting United States Attorney

/s/ LAURA JEAN BERGER  
LAURA JEAN BERGER  
Assistant United States Attorney


Dated: November 10, 2021

/s/ CHARLES LEE  
CHARLES LEE  
Counsel for Defendant  
BRENDA CARMONA-  
VENEGAS

**ORDER**

IT IS SO ORDERED.

Dated: **November 16, 2021**

  
DALE A. INGH  
UNITED STATES DISTRICT JUDGE